

# EXHIBIT B

## Zach Press

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**From:** Zach Press  
**Sent:** Thursday, February 23, 2023 17:22  
**To:** Mark Passin  
**Cc:** Nancy E. Wolff (nwolff@cdas.com); Benjamin Halperin; Lance Koonce; CeCe Cole  
**Subject:** RE: Freeman v. Wolff

Mark,

As we've mentioned before, we don't see why you would need native files of Prospect and Kim's Word documents. But if you have specific requests limited to a targeted set, please give us Bates numbers and we'll look into producing natives.

Best,  
Zach

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**Zach Press (he/him)**  
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## **KLARIS**

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**From:** Mark Passin <mark@csrlawyers.com>  
**Sent:** Tuesday, February 21, 2023 18:36  
**To:** CeCe Cole <CCole@cdas.com>; Lance Koonce <lance.koonce@klarislaw.com>  
**Cc:** Nancy E. Wolff (nwolff@cdas.com) <nwolff@cdas.com>; Benjamin Halperin <BHalperin@cdas.com>; Zach Press <zach.press@klarislaw.com>  
**Subject:** Freeman v. Wolff

Dear CeCe and Lance,

Our idiscover people have told us that they do have natives of word documents from Wolff and Entangled. They informed me that they did not see them originally because the file extension metadata was not provided in the metadata so the natives showed as a blank. However, they do not have native word document or word perfect documents from Kim and Prospect. Lance, can you please reproduce those documents in native format.

Thanks.

**Mark D. Passin  
Of Counsel**



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